



Arent Fox LLP / Attorneys at Law  
Boston / Los Angeles / New York / San Francisco / Washington, DC

April 19, 2019

VIA ECF

Magistrate Judge Robert M. Levy  
United States District Court  
Eastern District of New York  
United States Courthouse, Room 928S  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Allen G. Reiter**

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Re: *DMJ Associates, L.L.C. v. Carl A. Capasso*  
Civil Action No. 97-Civ-7285 (DLI) (RML)

Dear Magistrate Judge Levy:

We represent third-party plaintiff Quanta Resources Corporation in the above referenced matter. Pursuant to the Court's minute entry of April 5, 2019, together with counsel for third-party plaintiff Exxon Mobil Corporation and liaison counsel to a group of private third-party defendants, we write to report on the status of the parties' efforts to meet all pre-conditions to the filing of a stipulation of dismissal and the Consent Judgment with the federal defendants.

We have collected settlement payments from all but one of the private third-party defendants, and expect to receive that payment shortly. The parties propose to Your Honor that a further written report (or the stipulation and the Consent Judgment) be filed no later than May 10, 2019 regarding the status of all pre-conditions for the filings. Please let us know if this schedule meets with Your Honor's approval.

Respectfully submitted,

/s/ Allen G. Reiter

Allen G. Reiter

cc: All Counsel of Record (via ECF)